The Honorable James L. Robart 2 3 4 5 6 7 8 UNITED STATES DISTRICT COURT FOR THE 9 WESTERN DISTRICT OF WASHINGTON AT SEATTLE 10 11 12 THE HUMAN RIGHTS DEFENSE CASE NO. C18-01442-JLR CENTER, et al., 13 JOINT STATUS REPORT Plaintiffs. & ORDER 14 15 U.S. DEPARTMENT OF HEALTH AND 16 HUMAN SERVICES, et al., Defendants. 17 18 Plaintiffs THE HUMAN RIGHTS DEFENSE CENTER and MICHELLE 19 DILLON and Defendants U.S. DEPARTMENT OF HEALTH AND HUMAN 20 SERVICES, ADMINISTRATION FOR CHILDREN AND FAMILIES, and OFFICE OF 21 REFUGEE RESETTLEMENT hereby provide the Court with a Joint Status Report 22 pursuant to the Court's February 6, 2019 Order (Dkt. No. 21). 23 Plaintiffs filed this Freedom of Information Act ("FOIA") action seeking certain 24 documents from Defendants that Plaintiffs had requested pursuant to FOIA in August 25 2018. Plaintiffs allege that Defendants violated FOIA by not producing the requested 26 documents. As set forth in the parties' November 29, 2018 stipulated motion, the parties 27 intend to work cooperatively to attempt to resolve the litigation without motion practice. 28 Since the last filing, the parties have clarified the searches allowing Defendants to

continue searching for records. Unanticipated information technology issues have arisen, 2 and the parties are working cooperatively to understand and resolve those issues. 3 Because of the potential volume of records generated from the searches, the 4 parties have discussed utilizing a production schedule. However, until the technology 5 issues are resolved, the institution of an overall production schedule is unlikely. As this 6 is an ongoing process, and to allow the parties to resolve the technology issues, the 7 parties respectfully request that the Court allow the parties to update the Court within the 8 next thirty (30) days. 9 The parties propose a joint status report to be filed on or before May 6, 2019. 10 DATED this 5th day of April, 2019. 11 Respectfully Submitted, 12 13 14 ARETE LAW GROUP PLLC 15 s/ Jeremy E. Roller 16 JEREMY E. ROLLER, WSBA #32021 1218 Third Avenue, Suite 2100 17 Seattle, WA 98101 18 Phone: (206) 428-3250 Email: jroller@aretelaw.com 19 20 HUMAN RIGHTS DEFENSE CENTER 21 s/ Deborah M. G<u>olden</u> 22 DEBORAH M. GOLDEN (pro hac vice) 316 F Street, NE #107 23 Washington, D.C. 20002 24 Phone: (202) 543-8100 Email: dgolden@humanrightsdefensecenter.org 25 26 Attorneys for Plaintiffs 27 28

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EDI ORDER It is hereby ORDERED that: The parties shall submit a joint status report to the Court on or before May 6, 2019. Dated this <u>M</u> day of April, 2019. Honorable James L. Robart United States District Court Judge